

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

POST OFFICE STRUCTURE PLAN

DOCKET NO. N2012-2

INITIAL BRIEF OF DAVID B. POPKIN

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Respectfully submitted,

N20122BRIEF

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There are a number of points that I would like to make with respect to the Postal Service's proposal to change the retail service hours of many post offices.

1. The market survey conducted by the Postal Service shows that 15% of the customers chose Option 1. It would appear to me that these 15% of the customers did not understand the question. For example, if Office A was the office that was being closed and Office B was the office that remaining to provide full retail service. Regardless of the customer's present use of Office A or why he prefers Office B, having Office A available is better than not having it available. Let's also consider the testimony that USPS Witness Day stated at the hearing, namely, that he never uses the local post office where he lives but uses the post office at his work location in L'Enfant Plaza some 60 miles away. It is hard to believe that if Mr. Day was home on vacation and needed postal services that he would drive 60 miles to Washington rather than the local post office.

This raises a question on the validity of the market survey.

Among other questions, the survey asked the customers the following: "If you had to choose among these five options, what option would you select?" Figure 8 represents the responses to this question.

**Figure 8: Response to Market Research  
Question Regarding Service Options**

Option 1: Close your Post Office when it is located close to another Post Office, which will continue to provide full retail service to you.	15%
Option 2: Close your Post Office and contract with a local business such as a grocery or convenience store or a community organization to run a limited postal retail service.	11%
Option 3: Close your Post Office and contract with a local business or community organization to run a regular Postal Service retail office.	9%
Option 4: Close your Post Office and expand Rural Delivery Route service by which the rural carrier will sell stamps and other postal products, distribute supplies, and pick up prepaid packages.	11%
Option 5: Keep your local Post Office open for full retail service but the Post Office will operate for 2, 4 or 6 hours a day based on your community's needs.	54%

2. While the main thrust of this proceeding appears to be the reduction of retail service from the present level to 2, 4, or 6 hours. The Postal Service appears to be avoiding all of the ancillary services that take place.
  - a. Incoming mail must be placed in the local boxes for post office box holders. This normally takes place in the morning.
  - b. Incoming mail must be sorted for delivery routes operating out of the post office. This normally takes place in the morning.
  - c. Outgoing mail must be prepared for dispatch to the processing center. This normally takes place in the afternoon.
  - d. Outgoing mail collected by delivery carriers must be prepared for dispatch to the processing center. This normally takes place in the afternoon.
  - e. Customers will call for accountable mail or oversized parcels. This can take place at any time in the day.

These ancillary services will affect the time that a local community will choose for their limited retail window service hours. For example, if they choose their 2-hour slot to be 2 PM to 4 PM, then the box mail will not be placed into the boxes until sometime after 2

PM rather than the present morning time. This will have the effect of adding a day or more to the present delivery time.

3. The Brief that I filed in Docket N2012-1 still applies in this Docket in that the Postal Service must consider the combined effect of all of the service proposals.

Over the past few years, the Postal Service has made a number of other independent proposals to change the level of service on a national basis such as closing of post offices, changing the hours of post offices, eliminating Saturday delivery, eliminate Saturday mail processing. The Postal Service is treating these in a vacuum.

Let's look at what can be the combined effect of all of these changes. Assume that I am located next door to a post office that has a 5 PM dispatch to the processing center. If I walk next door and mail a letter at 4 PM on Monday that is going to another addressee within the overnight delivery area, it will be delivered on Tuesday.

Now assume that my post office is closed down and that I now receive delivery by a rural route operating out of another office and the carrier passes my box at 1 PM.

If I place a letter in my mail box in front of my location at the same 4 PM on Monday, the carrier will pick up the letter at 1 PM on Tuesday. Assume that when this carrier returns to the office, the final dispatch to the processing center has already been made; the letter will not be dispatched until Wednesday.

Assume that the delivery standards for my letter are one of those that have changed from overnight to a three-day delivery. The letter will arrive at its destination on Saturday and therefore will not be delivered until the following Monday or six days after the original conditions.

This does not take into account the possibility of a holiday